IN THE UNITED STATES DISTRICT COURT FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

CIVIL ACTION

RICHARD KATZ

Plaintiff :

v. :

NATIONAL BOARD OF MEDICAL : NO. 3:15-cv-01187

EXAMINERS

and

: FEDERATION OF STATE MEDICAL BOARDS :

Defendants

PLAINTIFF'S OPPOSITION TO DEFENDANT'S' MOTION TO FILE A BRIEF EXCEEDING 15 PAGES AND 5,000 WORDS

For the reasons discussed in the accompanying memorandum of law, pro se plaintiff Richard Katz, opposes the National Board of Medical Examiners (NBME) and the Federation of State Medical Boards (FSMB), request to move, pursuant to Local Rule 7.8(b)(3), for an Order authorizing them to file a brief in support of their motion for summary judgment that exceeds 15 pages and 5,000 words.

Respectfully Submitted,

Richard Katz

pro se

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____:

PLAINTIFFS' OPPOSITION TO DEFENDANTS' MOTION TO EXCEED PAGE LIMITS

The defendants have complied with the Court's requirement to seek leave before filing an over length brief, however, the defendants have not shown good cause to justify a need for excess pages. The defendants request would unduly burden plaintiff as well as the Court. The pro se plaintiff also argues that he would be prejudiced by having to respond to a 30- page brief with a 15-page reply.

Plaintiff is aware that Judges in the Middle District of Pennsylvania carry very heavy caseloads and are unable to devote inordinate time to individual cases and matters. Plaintiff is also realistic in acknowledging that the Court can not address every argument and matter raised by a party. Accordingly, the plaintiff believes that the parties should be presenting a distilled, succinct presentation of the facts and law necessary for the Court to reach a decision in this case.

By this time after discovery, an effort should be made by both parties to narrow the issues in dispute before the Court, not open the door for more confusion and debate. The defendants have utilized scorched earth litigation tactics throughout this lawsuit implementing excess in everything they do, their current request is no different.

Moreover, plaintiff believes that the defendants have not articulated good cause to obtain relief from the limitation limits. Defendants' general assertion that this pro se plaintiff "addresses multiple legal theories and other legal and factual issues" is lacking and not a very persuasive or compelling argument.

Conclusion

For all the foregoing reasons, the pro se plaintiff, respectfully requests that the Court **deny** the filing of the defendants' brief in support of their motion for summary judgment as all relevant factual and legal issues can be articulated within the standard page limitations without burdening this pro se plaintiff or this Court.

Respectfully Submitted,

Richard Katz

pro se

CERTIFICATE OF SERVICE

I hereby certify that a true and accurate copy of the foregoing has been served upon:

Michael Sacks

Hamburg & Golden, P.C. 1601 Market Street Suite 3310 Philadelphia PA 19103-1443

Date: April 27, 2016

Richard Katz

pro se